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UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re:

Chapter 11 Case No.

LEHMAN BROTHERS HOLDINGS INC., et al.,

Debtors.

(Jointly Administered)

JOINDER OF OFFICIAL COMMITTEE OF UNSECURED CREDITORS IN DEBTORS' OBJECTION TO MOTION OF GLG CREDIT FUND TO PERMIT IT TO FILE A LATE PROOF OF CLAIM PURSUANT TO FEDERAL RULE OF BANKRUPTCY PROCEDURE 9006(b)(1)

The Official Committee of Unsecured Creditors (the "Committee") of Lehman Brothers Holdings Inc. and its affiliated chapter 11 debtors and debtors in possession in the above-captioned case (collectively, the "Debtors") hereby joins (the "Joinder") in the Debtors' objection, filed on August 20, 2010 [Docket No. 10946] (the "Objection"), to the motion of GLG Credit Fund ("GLG") for an order deeming their late filed proof of claim to be timely filed under the principle of excusable neglect [Docket No. 9537] (the "GLG Motion"), and in support thereof, respectfully states as follows:

JOINDER

- 1. The Committee joins in the Debtors' opposition to the relief sought in the GLG Motion for all the reasons set forth in the Objection, including, without limitation, on the grounds that: (a) GLG's failure to timely file its proof of claim was an error entirely within its control and does not justify a finding of "excusable neglect"; and (b) GLG did not file its proof of claim against LBSF or the GLG Motion until more than eight months after the Bar Date¹ had passed.
- 2. While the Court has granted similar relief in these cases to a small number of movants, in each of those circumstances, the movants were entitled to such relief because of the confusion surrounding the procedures set forth in the Bar Date Order with respect to the Lehman Program Securities. No such confusion existed here. Therefore, any attempt to analogize the GLG Motion to those previously granted should be rejected.

[Remainder of page intentionally left blank.]

Capitalized terms not defined herein shall have the meanings ascribed to them in the Objection.

CONCLUSION

WHEREFORE, for all the reasons set forth herein and in the Objection, the Committee respectfully requests that the Court (i) deny the GLG Motion, and (ii) grant the Committee such other relief as is just.

Dated: New York, New York August 20, 2010

MILBANK, TWEED, HADLEY & McCLOY LLP

By: /s/ Dennis F. Dunne

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